

CAROL A. SOBEL, SBN 84483
MONIQUE A. ALARCON, SBN 311650
LAW OFFICE OF CAROL SOBEL
725 Arizona Avenue, Suite 300
Santa Monica, CA 90401
(t) 310-393-3055
(e) carolsobel@aol.com
(e) monique.alarcon8@gmail.com

PAUL HOFFMAN, SBN 71244
CATHERINE SWEETSER, SBN 271142
SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
11543 W. Olympic Boulevard
Los Angeles, CA 90064
(t) 310-396-0731
(f) 310-399-7040
(e) csweetser@sshlhlaw.com

Attorneys for Plaintiff,
DARREN "PETE" WHITE.

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

DARREN "PETE" WHITE,

Plaintiff,

v.

CITY OF LOS ANGELES, ET AL.,

Defendants.

Case No.: 2:17-cv-3306-SJO-MRW

JOINT¹ EXHIBIT STIPULATION

Date: August 21, 2018

Time: 9:00 a.m.

Dept.: 10C (Hon. S. James Otero)

Complaint filed: May 3, 2017

¹ Plaintiffs and defendants met and conferred about this stipulation and Plaintiff believes that it contains all Defendants' objections. Defendants' counsel was unable to review the finalized version and authorize her signature for filing due to being ill on August 6, 2018, but did authorize Plaintiff to file this version without her signature. Defendants will advise the court if an amended version is necessary.

PLAINTIFF'S EXHIBITS

Ex. No.	Description	If Objection, State Grounds	Response to Objection
1.	Arrest Report by Kinney (CITY 0001-0006)	Hearsay	This is a party admission and a prior inconsistent statement as it is authored by Defendant.
2.	Tort Claim (CITY 0009-0010)	Hearsay	Plaintiff introduces this exhibit for the purpose of demonstrating that the tort claim was timely filed.
3.	Watch Commander report (CITY 0023-0026)	Hearsay	As this is a document authored by Defendants' witness Sergeant Hurtado it can be introduced through his testimony.
4.	Adult Detention Log (CITY 0028)		
5.	Video of incident taken by Steve Diaz (MVI 1776)	Defendants object to this video being used at trial because it was requested by defendants during	Plaintiff provided this video to Defendants on July 23, 2018. Plaintiff did not "change his mind about

Ex. No.	Description	If Objection, State Grounds	Response to Objection
		discovery, plaintiff agreed in writing to provide the video, and then plaintiff changed his mind and refused to produce the video during discovery. At the time Defendants took the deposition of Plaintiff, the videos had not been produced to Defendants. Authentication and Foundation.	the video” but repeatedly offered to exchange the video with Defendants in exchange for their video. When the exhibit lists were exchanged and it became clear that Defendants do not intend to use the dashcam video as an exhibit at trial, Plaintiffs provided their trial exhibits to Defendants.
6.	Second video of incident taken by Steve Diaz (MVI 1777)	Same objection as #5	Same response as #5.
7.	Video taken by Pete White (MOV 25)	Same objection as #5	Same response as #5.
8.	Second video taken by Pete White (MOV 26)	Same objection as #5	Same response as #5.
9.	Ticket and notice to appear (E2999)	Hearsay	Plaintiff can authenticate this record as

Ex. No.	Description	If Objection, State Grounds	Response to Objection
			he was given the citation on the date in question; It is a business record; It is introduced to demonstrate the fact that a citation was issued at 8:50 AM.
10.	Investigative report (CITY 0022)	Hearsay	Plaintiff intends to use this for impeachment and to refresh recollection at trial.
11.	Photographs of interaction used in complaint	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at trial.
11A.	Plaintiff Videotaping a Police Interaction with a Homeless Person Located Between Wall Street and San Julian Street	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at trial.
11B.	Plaintiff Videotaping the Police Near Others	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at

Ex. No.	Description	If Objection, State Grounds	Response to Objection
			trial.
11C.	Plaintiff Behind Yellow Tape and Videotaping Sergeant Kinney	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at trial.
11D.	Plaintiff After His Arrest	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at trial.
12.	Photographs used as exhibits in the depositions of Edward Kinney and Howard Leslie	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at trial.
12A.	Photo of Plaintiff Handcuffed Behind Yellow Tape (Close-up)	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at trial.
12B.	Photo of Plaintiff Behind Yellow Tape Surrounded by Officers	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at trial.
12C.	Photo of Plaintiff being Handcuffed	Authentication and Foundation.	Plaintiff will lay foundation and authenticate the photo at

Ex. No.	Description	If Objection, State Grounds	Response to Objection
			trial.
13.	Google map of location where incident took place		
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			
24.			
25.			
26.			
27.			
28.			
29.			
30.			
31.			
32.			
33.			
34.			
35.			
36.			
37.			
38.			
39.			
40.			
41.			
42.			
43.			
44.			
45.			

Ex. No.	Description	If Objection, State Grounds	Response to Objection
46.			
47.			
48.			
49.			
50.			

DEFENDANTS' EXHIBITS

Ex. No.	Description	If Objection, State Grounds	Response to Objection
51.	Photographs of incident contained in Plaintiff's Complaint		
52.	Photographs used as exhibits in the depositions of Edward Kinney and Howard Leslie		
53.	Google Maps of the intersection and location where the incident took place (demonstrative)		
54.			
55.			
56.			
57.			
58.			
59.			
60.			
61.			
62.			
63.			
64.			
65.			
66.			
67.			
68.			

Ex. No.	Description	If Objection, State Grounds	Response to Objection
69.			
70.			
71.			
72.			
73.			
74.			
75.			
76.			
77.			
78.			
79.			
80.			
81.			
82.			
83.			
84.			
85.			
86.			
87.			
88.			
89.			
90.			
91.			
92.			
93.			
94.			
95.			
96.			
97.			
98.			
99.			
100.			

1 Dated: August 6, 2018

2 Respectfully submitted,

3 LAW OFFICE OF CAROL A. SOBEL
4 SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP

5 By: /s/ Catherine E. Sweetser

6 Carol A. Sobel

7 Catherine E. Sweetser

8 Monique Alarcon

9 *Attorneys for Plaintiff,*

10 *DARREN "PETE" WHITE.*